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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PHILLIP D. HURBACE,  
  
Defendant.

2:17-CR-110-APG-DJA

**Government's Unopposed Motion to  
Extend the Time to File a Reply to the  
Opposition, ECF No. 347**

**(First Request)**

The United States of America respectfully moves this Court for an Order extending the time for the government to file a reply to Hurbace's Opposition to the Government's Motion to Suggest Revisions or Modifications to the Preliminary Forfeiture Order, ECF No. 347. The current due date for the reply is October 13, 2023. The government requests an extension of time to, and including, October 27, 2023. This is the first request.

The grounds for extending the time are as follows.

On October 12, 2023, Osvaldo Fumo, counsel for Phillip Hurbace, agreed to this extension of time.

The undersigned has many tightly scheduled deadlines for district court cases with complex issues that have taken large amounts of time and resources to complete. Undersigned has worked extremely hard and efficiently in trying to meet all the deadlines but has not had time to address Hurbace's Opposition.

This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

1 For the reasons stated, this Court should grant an extension of time to, and  
2 including, October 27, 2023, for the government to file its reply.

3 Dated: October 12, 2023.

4 Respectfully submitted,

5 JASON M. FRIERSON  
6 United States Attorney

7 /s/ Daniel D. Hollingsworth  
8 DANIEL D. HOLLINGSWORTH  
9 Assistant United States Attorney

10 IT IS SO ORDERED:

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13 ANDREW P. GORDON  
14 UNITED STATES DISTRICT JUDGE

15 DATED: October 13, 2023  
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